

United States Bankruptcy Court

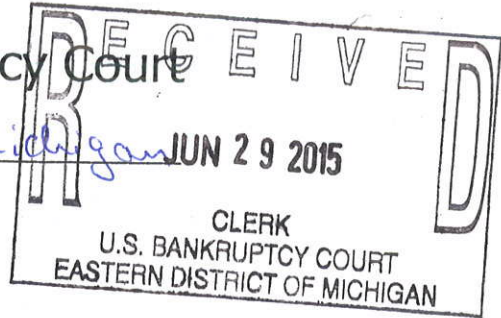
Eastern

District Of

Michigan

JUN 29 2015

In re City of Detroit  
Debtor



Case No. 13-53846

Chapter 9

Hon. Thomas

U.S. BANKRUPTCY COURT  
E.D. MICHIGAN - DETROIT  
CLERK

2015 JUN 29 P 4:04


FILED

MOTION TO PERMIT  
TRADITIONAL FILING

Jeffrey J. Ellison, on behalf of his client  
Tanya Hughes, requests permission to file a paper  
Response and Brief Opposing City of Detroit's  
Motion for Entry of Order (I) Enforcing the  
Plan of Adjustment Injunction and (II)  
Requiring the Dismissal of the State Court  
Action Filed by Tanya Hughes.

1. Ellison ~~has~~ is not ECF registered  
in Bankruptcy Court.
2. Ellison has had no involvement  
in the pending bankruptcy action  
and, as under the City's motion,  
had no reason to file in  
Bankruptcy Court.
3. The time for responding to the City's

4. Absent this order, Tanya Hughes would be deprived of the opportunity to respond to the Court or Sedovitz's motion.
5. The next ECF training will come too late to permit timely filing of Hughes' response to the motion.

Respectfully submitted,  


Dated: June 29 2015

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